

Renée L. Campbell, Esq. State Bar 104020  
Edi M. O. Faal, Esq. State Bar No. 107477  
Law Offices of Renée L. Campbell  
1055 West 7th Street, Suite 2140  
Los Angeles, CA 90017  
Telephone: (213) 534-0344  
Facsimile: (213) 534-0347

Attorneys for Plaintiff Danny Adams

Roger A. Colvin, Esq. State Bar No. 68773  
Sharon Apodaca, Esq. State Bar. No. 213798  
Alvarez-Glasman & Colvin  
13181 Crossroads Parkway North  
Suite 400, West Tower  
City of Industry, CA 91746  
Telephone: (562) 699-5500  
Facsimile: (562) 692-2244

Attorneys for Defendants  
City of Montebello, Police Officer Sergio Andrade  
and Detective Sean Hoffman

**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**

DANNY ADAMS,

Plaintiff,

v.

THE CITY OF MONTEBELLO; Police  
Officer SERGIO ANDRADE ; Detective  
SEAN HOFFMAN; and DOES 1 through  
10, all in their official and individual  
capacities, inclusive,

Defendants.

Case No.: CV 08-7778-GW(OP)  
*Honorable George H. Wu*

PROTECTIVE ORDER RE:  
DISCLOSURE OF CONFIDENTIAL  
INFORMATION

1 The following Stipulation is made by Plaintiff Danny Adams, on the one  
2 hand, and Defendants City of Montebello, Corporal Sergio Andrade, and  
3 Detective Sean Hoffman (collectively, "Defendants"), on the other hand, by and  
4 through their respective counsel of record.

5 WHEREAS Plaintiff has served Defendants with a Notice of Deposition of  
6 Corporal Sergio Andrade.

7 WHEREAS said Notice of Deposition calls for the production of  
8 information from the confidential personnel files of Corporal Andrade and  
9 Detective Hoffman consisting of documents and correspondence discussing,  
10 explaining, outlining, or otherwise referring to any reprimand, disciplinary action,  
11 or oral or written comment concerning the use of excessive, improper, or unlawful  
12 force, threats, or intimidation by Corporal Andrade or Detective Hoffman (the  
13 "Confidential Information").

14 WHEREAS the parties have agreed that the Confidential Information  
15 should be produced pursuant to a Protective Order.

16 WHEREAS the parties jointly propose that the following terms apply to any  
17 Confidential Information produced in response to the aforementioned Notice of  
18 Deposition:

19 1. Under no circumstances shall Confidential Information be used in  
20 any proceeding other than the instant case or be disseminated, in any form, except  
21 by court order.

22 2. Under no circumstances shall Confidential Information either orally,  
23 or by written form, be inputted into any computer program or database or listed  
24 manually in any manual, notebook or other listing as it pertains to law  
25 enforcement personnel. This does not apply to any computer program or case file  
26 maintained specifically as to this civil action.

27 3. Disclosure of Confidential Information shall be limited to the  
28 personnel and/or classification of persons listed below:

- 1 (a) Counsel for any party to this action;
- 2 (b) Staff personnel employed by counsel for any party;
- 3 (c) The court and its personnel, in connection with this litigation;
- 4 (d) Experts or consultants retained to work on this case by counsel
- 5 for any party to this case; and,
- 6 (e) Investigators retained by counsel for any party to this case, as
- 7 indicated above.

8 4. Plaintiff's counsel shall not provide to the Plaintiff, either orally or in  
9 writing, the addresses and telephone numbers of persons identified within the  
10 confidential information, but may discuss the information obtained from any  
11 investigation conducted with complainants or witnesses.

12 5. Counsel for any party to this action shall advise those individuals to  
13 whom disclosure of Confidential Information is to be made of the contents of this  
14 Protective Order, and such counsel shall obtain the consent of such individual that  
15 he or she will be bound by this Protective Order. In the event such individual  
16 does not consent to be bound by this Protective Order, no disclosure of  
17 Confidential Information will be made to such individual.

18 6. Any counsel, expert, consultant or investigator retained by counsel  
19 for any party to this case shall not refer to Confidential Information in any other  
20 court proceeding subject to further order of this court.

21 7. Except for documentation filed under seal by the court, all originals  
22 and copies of the Confidential Information shall be returned to counsel for the  
23 Montebello Police Department at the Montebello City Attorney's Office, 13181  
24 Crossroads Parkway North, Suite 400, West Tower, City of Industry, CA 91746.

25 8. This Protective Order, and the obligations of all persons hereunder,  
26 including those relating to the disclosure and use of Confidential Information,  
27 shall survive the final termination of this case, whether such termination is by  
28 settlement, judgment, dismissal, appeal or otherwise, until further order of the

1 court.

2 9. Nothing in this Protective Order is intended to prevent officials or  
3 employees of the Montebello Police Department, or other authorized individuals  
4 from having access to Confidential Information to which they would have had  
5 access in the normal course of their duties.

6 10. Violation of this court order may subject counsel and others to  
7 criminal and civil penalties.

8  
9 DATED: January 28, 2010

LAW OFFICES OF RENÉE L. CAMPBELL

10 Signed: /s/ Renée L. Campbell  
11 Attorney for Plaintiff Danny Adams

12 DATED: January 28, 2010

13 ALVAREZ-GLASMAN & COLVIN  
14 ARNOLD M. ALVAREZ-GLASMAN  
15 CITY ATTORNEY

16 Signed: /s/ Sharon Apodaca  
17 ROGER A. COLVIN  
18 SHARON APODACA  
19 Attorneys for Defendants CITY OF  
20 MONTEBELLO, OFFICER SERGIO  
21 ANDRADE, AND DETECTIVE SEAN  
22 HOFFMAN

23  
24  
25  
26  
27  
28  
IT IS SO ORDERED.

Dated: March 16, 2010

  
OSWALD PARADA MAGISTRATE JUDGE